

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

ADVANCED LITHIUM
ELECTROCHEMISTRY (CAYMAN) Co.
Ltd., and ADVANCED LITHIUM
ELECTROCHEMISTRY CO., LTD.,

*Declaratory Judgment
Plaintiffs,*

v.

HYDRO-QUEBEC; CENTRE NATIONAL
DE LA RECHERCHE SCIENTIFIQUE;
UNIVERSITE DE MONTREAL; and
LIFEPO4+C LICENSING AG,

*Declaratory Judgment
Defendants.*

Case No. 1:24-cv-01421-RDA-WBP

**DECLARATION OF AASHISH KAPADIA IN SUPPORT OF DEFENDANTS' MOTION
TO DISMISS**

I, Aashish Kapadia, hereby declare as follows:

1. I am an attorney with McDermott, Will & Emery and am counsel for Defendants Hydro-Quebec, Centre National de la Recherche Scientifique, Universite de Montreal, and LiFePO4+C Licensing AG (collectively, "Defendants"). I make this declaration in support of Defendants' Motion to Dismiss. I have personal knowledge of the facts contained within this declaration, and if called as a witness, would testify to the matters contained herein.

2. Attached hereto as **Exhibit A** is a true and correct copy of the United States Patent and Trademark Office File History of U.S. Patent No. 7,601,318 (excerpted and highlighted).

3. Attached hereto as **Exhibit B** is a true and correct copy of the United States Patent and Trademark Office File History of U.S. Patent No. 7,285,260 (excerpted and highlighted).

I declare under penalty of perjury under the law of the United States of America that the foregoing is true and correct.

Executed in Austin, Texas on this 18th day of December 2024.

/s/ Aashish Kapadia

Aashish Kapadia